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Date: April 17, 1995  
To: Peg Witherill  
From: Paul Singh *PS*  
Subject: Proposed Closure Strategy for Operable Unit No. 7  
cc: L. N. Klatt, ORNL; Jaime Brown, RFFO

**General Comment:**

1. The outline of the report appears to be adequate for communicating the DOE strategy for closure of this Operable Unit. However, a brief discussion on the history of this project would help the reader understand the current position.
2. I was somewhat disappointed by the lack of data presentation. For example, Table 1 and 2 present maximum concentrations of compounds that exceed ARARs. This type of data tables have gotten us into the current situation. We should not present any data without qualifier added by the lab or the data validation contractor. In addition, mean and the method detection limits should also be presented. The data tables currently in the report do not present an accurate picture of the contamination at the site. The DOE position should be backed up with enough data so that an independent reviewer can reach the same conclusions.
3. There is lack of information in the report on what was done at other sites in the state of Colorado. This information would help support DOE position and communicate to the agencies that the DOE proposal is not unreasonable.
4. Report needs an executive summary.
5. DOE is proposing to delist surface water in pond under CERCLA. The report should cite example where this has been proposed and successful. If Rocky Flats is going to be the first site, it may not be worth fighting the battle.

**Specific Comments:**

1. Page 8, Section 2.1.1, Second paragraph  
F039 term should not be used to discuss data that was collected prior to enactment of RCRA.
2. Page 12, Section 2.2.2  
Data should be given with the chemical. It is pointless to say that concentrations were elevated.
3. Page 18, Section 2.5.2  
The quantity of groundwater present in the landfill gives the reader an idea that there is lot of water there. Perhaps if number for similar size land area in the front range area is also presented it may help the reader put this into perspective.

ornl

OAK RIDGE NATIONAL LABORATORY  
Managed by Martin Marietta Energy Systems, Inc., for the U. S. Department of Energy

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4. Page 29, Section 3.1.3, First Paragraph, Second Sentence

Not clear what is meant by "portion".

# REVIEW COMMENT SHEET

Time Spent on Review: \_\_\_\_\_ hrs.

Return to:

If questions on content, please call the SME:

FAX \_\_\_\_\_ Name \_\_\_\_\_ Ext. \_\_\_\_\_ Location \_\_\_\_\_ Name \_\_\_\_\_ Ext. \_\_\_\_\_ Title \_\_\_\_\_  
 Paul Singh X3490 \_\_\_\_\_ Page 1 of 1

Please review the attached procedure:

Proposed Closure Strategy for OU7, Draft Report, April 13, 1995

Comment Due Date: \_\_\_\_\_

Number \_\_\_\_\_ Rev. \_\_\_\_\_ Draft \_\_\_\_\_

☐ Internal Review ☐ Parallel Review ☐ Verification ☐ Validation ☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-A03-PPG-004 provides complete definitions of General and Mandatory comments.

TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INT/DATE
8		2.1.1 2d para.	FO39 term should not be used to discuss data that was collected prior to enactment of RCRA		
12		2.2.2	Data should be given with the chemical. It is pointless to say that concentrations were elevated.		
18		2.5.2	The quantity of groundwater present in the landfill gives the reader an idea that there is a lot of water there. Perhaps if number for similar size land area in the front range area is also presented, it may help the reader put this into perspective.		
29		3.1.3	First para., second sentence. Not clear what is meant by "portion".		

POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)

- ☐ No Comments  
☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur.

Resolutions Accepted

Paul Singh \_\_\_\_\_ Name \_\_\_\_\_ Signature \_\_\_\_\_  
 X3490 \_\_\_\_\_ DOE, ER MSA DIV \_\_\_\_\_ 4/21/95  
 Ext./Pager/Fax \_\_\_\_\_ Bldg./Dept./AGM \_\_\_\_\_ Date \_\_\_\_\_

Initials \_\_\_\_\_ Date \_\_\_\_\_

NOTE: These reviews are completed by qualified reviewers in accordance with 1-A03-PPG-004 in concert with 1-A01-PPG-001 and 1-A02-PPG-003.

RF-47947 (5/93)

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